

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO: 04-10080-GAO

RALPH J. VOLLMAN, *
Plaintiff *

vs. *

ROGER LYNN GRUBB and *
ALLIED SYSTEMS LTD., *
Defendants/Third Party Plaintiffs *

vs. *

SHOWCASE ISUZU, *
Third Party Defendant *

PLAINTIFF'S STATUS CONFERENCE MEMORANDUM

1. Suggestion of Bankruptcy. As the Court is aware, Defendants have filed for Chapter 11 bankruptcy protection in the Bankruptcy Court of the Northern District of Georgia. Plaintiff is in the process of filing a motion for relief of the automatic stay as a result of the bankruptcy filing.
2. Upon relief from stay:
 - a. **Outstanding discovery.** Defendants have outstanding discovery responses due to Plaintiff. Otherwise, all other written discovery and depositions have been completed to Plaintiff's knowledge.
 - b. **Expert disclosure.** Dates for expert disclosure for all parties will need to be established.
 - c. **Scheduling of status conference and/or pre-trial conference.**

Ralph J. Vollman,
By his attorney,

Dated: 9/19/05

/s/ Paul Nathan
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